

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF OHIO  
 EASTERN DIVISION

NIKKI KELLEY, ) Case No. 5:20-cv-00412-SL  
 )  
 Plaintiff, ) Judge Sara Lioi  
 )  
 vs. ) **PLAINTIFF'S PRELIMINARY ESTIMATE**  
 ) **OF ATTORNEYS' FEES AND EXPENSES**  
 PUB GROUP 3 MANAGEMENT, LLC, ET AL., )  
 )  
 Defendants. )

The following is a preliminary estimate of Plaintiff, Nikki Kelley's anticipated attorneys' fees and expenses:

	<u>Attorneys' Fees</u>	<u>Expenses</u>
Preliminary Investigation and Filing Complaint	\$ 1,757.50	\$ 400.00
Procedural Motion Practice	\$ 5,000.00	\$ 1,000.00
Discovery	\$15,000.00	\$ 1,000.00
Depositions	\$15,000.00	\$10,000.00
Dispositive Motion Practice	\$20,000.00	\$ 200.00
Settlement Negotiations	\$ 3,000.00	N/A
Experts	\$ 2,000.00	\$ 5,000.00
Witness Fees	N/A	\$ 500.00
Trial	\$75,000.00	\$ 5,000.00
<b>TOTAL</b>	<b>\$136,757.50</b>	<b>\$23,100.00</b>

Respectfully submitted,

/s/ Matthew S. Grimsley

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 30th day of June 2020, the forgoing was sent by email to: Ralph Dublikar, Esq. (*dublikar@bakerfirm.com*) and Andrea Ziarko, Esq. (*andreas@bakerfirm.com*), Baker, Dublikar, Beck, Wiley & Matthews, 400 South Main Street, North Canton, Ohio 44720, counsel for Defendants.

/s/ Matthew S. Grimsley

One of Plaintiff's Attorneys